Atlantic Richfield Company

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October 10, 2016

CERTIFIED - RETURN RECEIPT REQUESTED

Mr. Dave Seter Remedial Project Manager U.S. Environmental Protection Agency - Region 9 75 Hawthorne Street, SFD-9-1 San Francisco, CA 94105

Subject: September 2016 Monthly Report, Yerington M ine Site, Lyon County, Nevada:

Administrative Order for Remedial Investigation and CERCLA Docket No. 9-2007-0005; Administrative Order on Consent, CERCLA

Docket No. 09-2009-0010

Dear Mr. Seter:

Pursuant to the above referenced orders issued by t he U.S. Environmental Protection Agency - Region 9 (EPA), Atlantic Richfield Company (ARC) has prepared this September 2016 monthly report for RI/FS and Operations and Maintenance (O&M) activities at the Yerington Mine Site (Site).

September 2016 Activities

Site Security and O&M Activities

- Continued Site O&M, security and bird deterrent ac tivities. The two security cameras indicated no activity of concern.
- Wind dancers, bird deterrent flags and Wetland Wai
 with current EPA-approved bird deterrent protocols.
 to the presence of wind dancers and flags, these de towers 'A', 'B' and 'C' were not in operation throughout September due to dry Site conditions.
- Continued the EPA-approved bird deterrent schedule with at least three monitoring visits per day at all ponds. Observations were made within half a n hour of dawn and dusk.
- PWS Pond water levels: North Cell = 0.0 feet; Midd le Cell = 0.0 feet; South Cell = 0.0 feet.
- As of September 30, the Arimetco FMS pond levels w
 Evaporation Pond A = 8.43 feet; FMS Evaporation Pond d B = 5.66 feet; FMS Evaporation Pond C
 = 5.41 feet; VLT Pond = 9.77 feet; Slot Pond = 8.34
 Evaporation Pond A on September 30 was approximatel y 1.73 feet. Fluid transfers in September consisted of 9,275 gallons from the Phase 1 Pond to Pond C, 264,208 gallons from the Slot Pond to Pond S B and C, and 172,642 gallons from the Slot Pond to the VLT Pond (to facilitate performance of the SPS enhanced evaporation pilot s tudy system). SPS continued to operate the enhanced evaporation pilot study system at the VLT Pond, which ended on September 30. See attached monitoring data.
- No rainfall occurred during September and total Si te rainfall remained at 3.1 inches since January 1, 2016. See attached monitoring data.



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September 2016 Activities - Continued

Site Security and O&M Activities - Continued

- Approximately 25,024 gallons of solution were pump ed from the leak detectors in September including 1,579 gallons from the VLT ditches and Se diment Pond, and 22,725 gallons from the Slot HLP perimeter collection ditch. See attached monitoring data.
- FMS pond samples for total dissolved solids (TDS) analyses and electrical conductivity (EC) measurements were obtained on September 20 from var ious depths and locations around the ponds.
- Initiated LEP/UEP dust suppression efforts (spray application of surfactant) on September 28.

Site Characterization Activities

- Site-wide monthly groundwater elevation measuremen ts were obtained September 20-21 from new monitor wells and wells outfitted with pressure transducers.
- A Pit Lake water elevation of 4,234.84 feet amsl w transducer, a decrease of 0.13 feet since July 23, approximately 0.84 feet since August 23, 2015.
- A notification was submitted to EPA on September 3
 associated with the sampling of seven monitor wells
 A safety review will be conducted, and possible mitigation will be evaluated prior to the resumption of monitoring at these well sites.
- Performed the 3Q 2015 domestic well monitoring eve nt September 13-14.
- Continued the compilation of data for inclusion in the 1Q 2016 Groundwater Monitoring Report (GMR) and the 1Q 2016 Domestic Well Monitoring Report (DWMR). Initiated the compilation of data for the 2Q 2016 GMR and DWMR.
- No changes to the bottled water or domestic well m onitoring programs in September.
- Submitted a letter to EPA on September 1 that: 1) documents the extension of Yerington City municipal water service to certain properties previ ously included in the Domestic Well Monitoring Program and Bottled Water Program; AND 2) requests confirmation that ARC will no longer be required under the Unilateral Administrative Order for Initial Response Activities, Docket No. 9-2005-0011 and the Administrative Order on Consent a nd Settlement Agreement for Removal Action and Past Response Costs, Docket No. 09-2009- 0010 to perform domestic well monitoring or provide bottled water at/to any property that re ceives City of Yerington municipal water service or is receiving treated domestic water from the Yerington Paiute Tribe public water system.
- Continued the preparation of a technical memorandu m describing proposed modifications to the Site-wide groundwater monitoring program.
- Received comments on the Background Groundwater Qu ality Assessment Revision 2 (revised BGQA) from EPA via e-mail on September 27, and init lated a review of the comments.
- Continued to compile data resulting from the Wabus ka Drain (OU-7) Phase 1 field sampling and analytical activities.
- Removable steel plates were placed over the vadose sub-grade wiring. Water added to the borehole duri continues to be purged out of 13 of 15 lysimeters. dry of added water. Characterization and vadose zo Ponds were surveyed on September 22.
 zone monitoring equipment to protect the ng installation of the porous cup lysimeters. The other two lysimeters have been purged ne monitoring locations for the Evaporation
- Routine database management in support of Site inv estigations and monitoring activities.

Planned October/November 2016 Activities

Site Security and O&M Activities

- Continue routine Site O&M, security and bird deter rent activities.
- Continue FMS pond sampling for total dissolved sol ids (TDS) analyses and electrical conductivity (EC) measurements.
- Complete dust suppression activities on the Evapor
- Initiate the update to FMS water balance model to evaporation test on the VLT heap leach pad.

ation Ponds.

include the effects of the SPS enhanced

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Planned October/November 2016 Activities - continue d

Site Characterization Activities

- Continue groundwater elevation and pit lake level measurements, and meteorological monitoring.
- Perform the 4Q 2016 groundwater monitoring event.
 starting the week of October 3.
- Prepare for and perform the 4Q 2016 domestic well monitoring event in early November.
- Continue the Bottled Water Program. Properties th at have received City of Yerington water system connections are gradually being removed from the Program.
- Complete the compilation of data for inclusion in the 1Q 2016 GMR and DWMR, and transmit these reports to EPA. Continue the compilation of data for the 2Q 2016 GMR and DWMR.
- Complete and transmit the Tech Memo describing pro groundwater monitoring program. Continue discussio reductions to the groundwater and domestic well mon parameters, wells to be sampled and the quarterly/annual report contents.
- Continue to review EPA comments on the revised BGQ
 A, and initiate further revisions to the document.
- Continue to compile information for inclusion in t
 chemical concentration stability in Site-wide groun dwater monitor wells.
- Complete and transmit the Draft Process Areas (OU- 3) RI Report.
- Complete and transmit the OU-7 Phase 1 FSAP DSR. Participate in a conference call on October 19 to discuss the field and analytical data.
- Continued the compilation of data for the Evaporat ion Ponds DSR.

Please contact me at (657) 529-4581 or via e-mail a t jack.oman@bp.com if you have any questions or comments about this September 2016 monthly report.

Sincerely,

Jack Oman Project Manager

Attachment

cc: Harry Ball, EPA - via electronic mail

Dante Rodriguez, EPA – via electronic mail James Collins, EPA – via electronic mail

Tom Dunkelman, EPA – via electronic mail

Jeff Collins, NDEP - via electronic mail

Jeryl Gardner, NDEP - via electronic mail

Dave Davis, BLM - via electronic mail

Dan Newell, City of Yerington - via electronic mail

Phyllis Hunewill – via electronic mail

Jim Sanford, MVEC – via electronic mail

Tom Grady, Nevada State Assembly - via electronic mail

Chairwoman Thom, YPT - via electronic mail

Ginny Hatch, YPT - via electronic mail

Deborah Dunn, YPT - via electronic mail

Dietrick McGinnis, McGinnis and Associates - via electronic mail

Tom Bowden, Ridolfi, Inc. - via electronic mail

Chairman Sanchez, WRPT - via electronic mail

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> Cynthia Oceguera, WRPT - via electronic mail Ron Halsey, Atlantic Richfield Company - via electronic mail Nathan Block, Atlantic Richfield Company - via electronic mail Patricia Gallery, Atlantic Richfield Company - via electronic mail Brian Johnson, Atlantic Richfield Company - via electronic mail John Batchelder, EnviroSolve - via electronic mail Dan Ferriter, Copper Environmental – via electroni c mail Mike Mahon, Copper Environmental – via electronic mail Randy Miller, Broadbent - via electronic mail Travis Phelps, Arcadis – via electronic mail Jim Chatham, Atlantic Richfield Company - via electronic mail Adam Cohen, Davis Graham & Stubbs - via electronic mail Bill Duffy, Davis Graham & Stubbs - via electronic mail Tom Patton, Singatse Peak Services, LLP - via electronic mail Taurus Massey, Singatse Peak Services, LLP – via electronic mail David Peri, Peri and Sons - via electronic mail John McMillan, CBI - via electronic mail Julian Isham, CBI - via electronic mail Victor Early, Tetra Tech – via electronic mail Colin Lee, Tetra Tech - via electronic mail Ken Greene, CH2M Hill - via electronic mail Peggy Pauly, YCAG - via electronic mail Lyon County Library System Central